Code Of Conduct for Suppliers









Preface

ENGEL offers complete injection moulding solutions from a single source. As a leading producer of injection moulding machines, we are committed to the innovative development and production of such machines and the automation for these. With innovative technologies, state-of-the-art production facilities and sustainable service and support, we enable our customers to be competitive and successful.

Just as specific quality criteria obviously apply to our machines, clearly defined values apply to our conduct towards customers, Suppliers, employees and other business partners.

This Code of Conduct represents basic values that apply to the entire ENGEL Group and thus the basis for long-term, ethically correct and legally compliant Supplier relationships. Equal opportunities and fair remuneration in accordance with local standards are important in this context. We offer wages and social benefits that at least meet national and local as well as industry standards, including retirement and health benefits. Accordingly, we expect our Suppliers to support our policy of corporate responsibility and, in addition, to comply with the 10 universal principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises as principles of this Code. Compliance with this Code is an important basis for us to continue our business relationships with our Suppliers.

The key principles and rules that guide our actions and the standards we set ourselves in our dealings with business partners and interest groups are summarized in this Code of Conduct. For our Suppliers, it provides a framework guideline to the topics human rights, employment, environment and anti-corruption.

Dr. Stefan Engleder

CEO

Dr. Max Pernsteiner VP Global Supply Chain

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Human Rights

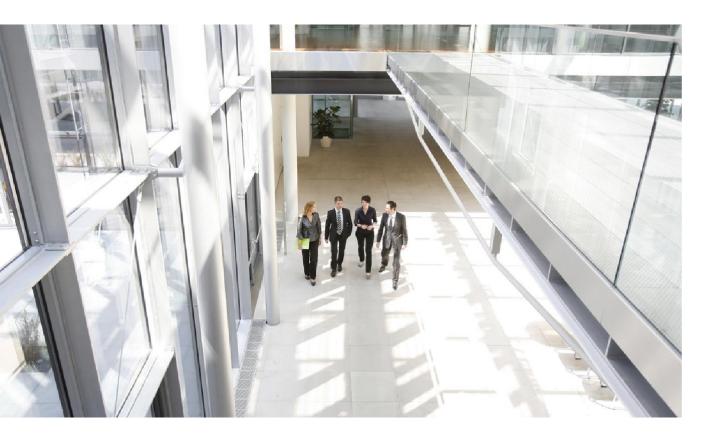
Businesses should support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses.

Our Supplier undertakes to respect human rights in accordance with the United Nations' "Universal Declaration of Human Rights" and will respect and support the principles of the United Nations' Global Compact. These principles obligate companies to recognize, support and implement a set of core values within their sphere of influence.

ENGEL expects compliance with the applicable national employment conditions and recognition of the core labour standards of the International Labour Organization (ILO) and the rights established by the Organization for Economic Cooperation and Development (OECD).

In addition, our Supplier shall observe the employees rights regarding freedom of assembly as well as the respective applicable national standards and guidelines regarding remuneration and working hours. We believe that respect for human rights is a basic necessity for cooperation.

Our Supplier is obligated to comply with all nationally applicable regulations on occupational health and safety. Within this framework, our Supplier must take all reasonable measures, e.g. in the formof training, to improve occupational safety, prevent occupational diseases and minimize health or accident risks as far as possible.



Employment

Businesses should uphold the freedom of association, the elimination of all forms of forced and compulsory labour, the effective abolition of child labour and the elimination of discrimi- nation in respect of employment and occupation.

Our Supplier undertakes to refrain from any form of forced labour or compulsory labour. All work must be voluntary and employees at all times must be able to terminate their work or employment. In addition, there should be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment.

Child labour is not allowed to be used at any stage of production. Suppliers are required to comply with the recommendations of the ILO conventions 138 on the minimum age for the employment of children. According to these, the age should not be lower than the age at which compulsory schoolingends and in any case not lower than 15 years. In any case, our Suppliers must observe and comply with all applicable national regulations. If children are seen at work, our Supplier must document the measures to be taken to solve the situation and make it possible for the children to attend school. The rights of young workers must be protected and special protective regulations must be observed.

Equal treatment of all employees with regard to social or ethnic origin/belonging, skin colour, religion, gender, sexual orientation, age, physical abilities, state of health, political views, nationality, union membership, marital status or other personal characteristics must be guaranteed. Employees must be protected against rough or inhuman treatment at the workplace. Accordingly sexual harassment, sexual abuse, physical punishment, mental or physical coercion and insulting of employees shall be unconditionally abolished.

All employees are fairly compensated for their work in accordance with applicable laws and regulations and receive all benefits required by law. Terms and conditions of employment, including wages, hours of work, vacation, time off and public holidays, are subject to the laws and regulations and binding industry standards of the country in which the company operates.

Environment

Businesses should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies.

Environmental protection is an integral part of ENGEL's sustainable corporate culture. All Suppliers are therefore expected to comply with all applicable environmental regulations, to develop and manufacture products in an environmentally compatible manner and to transport, use and dispose of them, to conserve resources by using energy-efficient and environmental friendly technologies, to reduce the amount of waste and emissions into air, soil and water and to minimise environmental risks.

Suppliers are also expected to work on the continuous improvement of their energy and environmental processes and products, ideally by demonstrating appropriate environmental and energy management systems (e.g. in accordance with DIN EN ISO 14001 or EMAS and ISO 50001). In addition, our Supplier must observe ENGEL's energy and environmental policy.

Anti-Corruption

Businesses should work against corruption in all its forms, including extortion and bribery.

ENGEL expects its Suppliers to comply with applicable anti-trust and competition law, moreover ENGEL opposes any kind of corruption and does not tolerate any violations in this regard. Accordingly it is expected that Suppliers do not tolerate or engage with any form of corruption or bribery in any way, including unlawful payment offers or similar benefits to influence decision-making.

ENGEL makes any business-related decisions based on objective criteria and not based on private interests or relationships. The very same is expected from its Sub-Suppliers.

All gifts, invitations or other benefits from Suppliers or their representatives to employees of ENGEL must be kept within socially customary, appropriate and transparent limits.

Our Supplier or his representative shall not offer, promise or grant personal advantages (invitations, gifts or other benefits) to employees of ENGEL which, according to objective assessment, are likely to cause an unfair influence on business conduct. Even the appearance of such dishonesty is to be avoided.

Obligations

In cooperation with its Suppliers, ENGEL aims to ensure that this code is implemented sustainably throughout the entire supply chain. ENGEL therefore expects its Suppliers to pass on the principles and requirements of this Code of Conduct to their sub-Suppliers and to make every effort to ensure that the requirements agreed in it are adhered to, promoted and monitored.

In the event of suspected violations of the requirements of this Code of Conducts, such as but not limited to negative media reports, information from employees, ENGEL reserves the right to request more detailed information on the relevant topics and to carry out the necessary checks to clarify such suspicions or, if necessary, to take appropriate measures.

Our Supplier also undertakes to allow confidential interviews with his employees with auditors from ENGEL on request. If the suspicion of a violation of this Code of Conduct is confirmed, our Supplier shall, in consultation with ENGEL, initiate appropriate measures for improvement within a reasonable periode of time. If such measures are not implemented within the agreed time frame or if our Supplier generally fails to comply with the provisions of this Code of Conduct, this shall be deemed as a significant impairment of the contractual relationship and the contractual basis.

In such cases ENGEL and/or its respective affiliate reserve the right to terminate the agreed contract with our Supplier without notice with immediate effect. In the event of a culpable breach of the provisions of this Code of Conduct incurring damage to ENGEL and/or its respective affiliated reserve the right to claim damages from our Supplier.

ENGEL encourages its employees as well asits business partners to report information on criminal activities or serious misconduct that may affect ENGEL.

Neither ENGEL nor its business partners accept any form of discrimination against persons who in good faith have provided legitimate information to ENGEL.



Integrity Helpline

An Integrity Helpline has been set up to ensure that the basic principles of this Code of Conduct are respected on a long-term and sustainable basis. The Helpline, which can be accessed at compliance@engelglobal.com, is ENGEL's first point of contact for compliance-related inquiries and reports.